

United States District Court  
Southern District of Texas  
FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION

APR 20 2021

Nathan Ochsner, Clerk

UNITED STATES OF AMERICA

V.

MARIA ESTELA SUPRISE

YOLANDA PENA

DAISY YANNETTE SUPRISE

FRANCISCO DOMINGUEZ-BERMUDEZ

§  
§  
§  
§  
§  
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§

CRIMINAL NO. M-21-0603-S1

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

From on or about September of 2013 until on or about March 23, 2021, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

MARIA ESTELA SUPRISE  
YOLANDA PENA  
DAISY YANNETTE SURPRISE  
and  
FRANCISCO DOMINGUEZ-BERMUDEZ

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

- a. knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of currency and/or money orders, which involved the proceeds of a specified unlawful activity, that is the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and

that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

- b. did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the receipt of currency and/or money orders, which involved the proceeds of a specified unlawful activity, that is the distribution of a controlled substance, an offense punishable under Title 21 of the laws of the United States, knowing that the transaction was designed in whole and in part to avoid a transaction reporting requirement under Federal law and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and(ii) and (h).

**NOTICE OF CRIMINAL FORFEITURE**

Pursuant to Title 18, United States Code, Section 982(a)(1), the United States of America gives notice to the defendants,

**MARIA ESTELA SUPRISE  
YOLANDA PENA  
DAISY YANNETTE SURPRISE  
and  
FRANCISCO DOMINGUEZ-BERMUDEZ**

that upon conviction of an offense in violation of Title 18, United States Code, Section 1956 as charged in Counts One of the Indictment, the United States of America shall forfeit any property, real or personal, involved in such offense, or any property traceable to such property.

The property to be forfeited includes, but is not limited to, the following:

- a. \$2,017,295.92
- b. \$62,228.00
- c. \$11,461.00
- d. \$17,146.00
- e. \$10,245.06
- f. \$45,550.00

The United State intends to seek a personal money judgment.

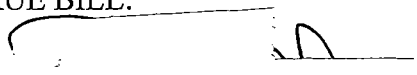
**SUBSTITUTE ASSETS**

In the event the property that is subject to forfeiture, as a result of any act of omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty

it is the intent of the United States to seek forfeiture of any other property of the defendants up to the value of such property, pursuant to Title 18, United States Code, Section 982(b)(1) incorporating Title 21, United States Code, Section 853(p).

A TRUE BILL:

  
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FOREPERSON OF THE GRAND JURY

JENNIFER B. LOWERY  
ACTING UNITED STATES ATTORNEY

  
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ASSISTANT UNITED STATES ATTORNEY